

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

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Hon.

Criminal No. 20-

119 (RBK)

v.

KHALIF TOOMBS

INFORMATION

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

From in or about April 2019 through in or about June 2019, in Atlantic County, in the District of New Jersey and elsewhere, defendant

KHALIF TOOMBS

did knowingly and intentionally conspire and agree with Terryn Kelsey, Tieyesha Tucker, Wayne Burnside, and others, known and unknown, to distribute and to possess with intent to distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

In violation of Title 21, United States Code, Section 846.



CRAIG CARPENITO
United States Attorney

CASE NUMBER:

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

KHALIF TOOMBS

INFORMATION FOR

21 U.S.C. § 846

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